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ATTORNEYS FOR PLAINTIFF

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION

GEORGINE SCOTT-CODIGA,
Plaintiff,

vs.

COUNTY OF MONTEREY, MONTEREY
SHERIFF'S DEPARTMENT, SHERIFF MIKE
KANALAKIS, JERRY TEETER, VICTOR LURZ,
COMMANDER MIKE RICHARDS; SGT JOE
MOSES; and GILBERT AGUILAR and Does 1
through 50, inclusive,
Defendants

Case No.: 5:10-cv-05450-LHK

**STIPULATION OF SERVICE AND
STIPULATION AND ORDER ENLARGING
TIME FOR DEFENDANTS TO RESPOND TO
PLAINTIFF'S AMENDED COMPLAINT**

The parties through their respective counsel of record hereby stipulate and agree to
an order on the following issues:

1. Defendants, COUNTY OF MONTEREY, MONTEREY SHERIFF'S DEPARTMENT,
SHERIFF MIKE KANALAKIS, JERRY TEETER, and VICTOR LURZ were timely
served with Plaintiff's initial complaint. Following service, Plaintiff filed a
supplemental claim alleging new causes of action based on conduct which
took place following the filing of the initial complaint. Parties met and

1 conferred and decided it would be most efficient for Defendants to respond
2 to Plaintiff's to-be-filed amended complaint rather than the filed and served
3 initial complaint. Therefore parties agreed and hereby stipulate that
4 Defendants do not have to respond to Plaintiff's initial complaint, filed on
5 December 1, 2010.
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7 2. Plaintiff filed an amended complaint on May 6, 2011. Plaintiff served
8 Defendants, COUNTY OF MONTEREY, MONTEREY SHERIFF'S DEPARTMENT,
9 SHERIFF MIKE KANALAKIS, JERRY TEETER, VICTOR LURZ, COMMANDER
10 MIKE RICHARDS; SGT JOE MOSES; and GILBERT AGUILAR, and each of them,
11 with the amended complaint via email to Defendants' counsel. Parties
12 hereby agree and stipulate that Plaintiff's email service is sufficient service
13 for all Defendants and all Defendants are deemed to have been served with
14 the amended complaint as of May 17, 2011, the day counsel for the
15 Defendants acknowledge receipt of the amended complaint.
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17 3. Parties hereby stipulate and agree that Defendants, COUNTY OF MONTEREY,
18 MONTEREY SHERIFF'S DEPARTMENT, SHERIFF MIKE KANALAKIS, JERRY
19 TEETER, VICTOR LURZ, COMMANDER MIKE RICHARDS; SGT JOE MOSES; and
20 GILBERT AGUILAR have until June 17, 2011 to file and serve a response to
21 the amended complaint filed by Plaintiff GEORGINE SCOTT-CODIGA. Good
22 cause exists for this enlargement of time (30 additional days) given the time and
23 effort that will be necessary to prepare an appropriate responsive pleading. The
24 amended complaint involves varied claims by plaintiff, comprises 24 pages, and sets
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1 forth 10 causes of action in 86 paragraphs. The causes of action include the
2 following:

- 3 1. RETALIATION IN VIOLATION OF TITLE VII and FEHA;
4 2. RETALIATION IN VIOLATION OF 42 U.S.C. § 1983;
5 3. DISPARATE TREATMENT, TITLE VII AND FEHA,
6 4. FAILURE TO PREVENT DISCRIMINATION
7 5. INVASION OF PRIVACY
8 6. RETALIATION LABOR CODE 1102.5
9 7. VIOLATION OF LABOR CODE 1101 &1102
10 8. INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS;
11 9. VIOLATION of 42 U.S.C. § 1985
12 10. VIOLATION of 42 U.S.C. § 1986

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14
15 IT IS SO STIPULATED

16
17 **Dated: May 19, 2011**

LAW OFFICES OF BONNER & BONNER

18 /s/ A. CABRAL BONNER
19 A. Cabral Bonner
20 Attorney for Plaintiff

21 **Dated: May 19, 2011**

**COUNTY COUNSEL FOR
COUNTY OF MONTEREY**

22 /s/ WILLIAM K. RENTZ
23 WILLIAM K. RENTZ
24 Sr. Deputy County Counsel

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ORDER

IT IS SO ORDERED. Defendants do not have to respond to Plaintiff's initial complaint filed on December 1, 2010. All Defendants, COUNTY OF MONTEREY, MONTEREY SHERIFF'S DEPARTMENT, SHERIFF MIKE KANALAKIS, JERRY TEETER, VICTOR LURZ, COMMANDER MIKE RICHARDS; SGT JOE MOSES; and GILBERT AGUILAR are deemed served with Plaintiff's amended complaint. Defendants may have to and including June 17, 2011 by which to file and serve a response to Plaintiff's amended complaint.

Dated: May 20, 2011



HONORABLE LUCY H. KOH
United States District Court Judge